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13 *Attorneys for Plaintiffs and the Classes*

14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

17 MARTIN SCHNEIDER, SARAH  
DEIGERT, THERESA GAMAGE, and  
18 NADIA PARIKKA, Individually and on  
Behalf of All Others Similarly Situated,

19 Plaintiffs,

20 v.

21 CHIPOTLE MEXICAN GRILL, INC., a  
22 Delaware Corporation,

23 Defendant.  
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*Attorneys for Defendant*  
*Chipotle Mexican Grill, Inc.*

Case No. 4:16-cv-02200-HSG

**JOINT STIPULATION AND ORDER  
CONTINUING DEADLINE TO FILE  
MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT**

Judge: Hon. Haywood S. Gilliam, Jr.  
Ctm: 2, 4th Floor  
.

1           **WHEREAS**, on July 2, 2019, Plaintiffs Martin Schneider, Sarah Deigert, Theresa  
2 Gamage, and Nadia Parikka (“Plaintiffs”) and Defendant Chipotle Mexican Grill, Inc.  
3 (“Defendant,” and with Plaintiffs, the “Parties”) completed an in-person mediation with the Hon.  
4 Jay C. Gandhi (Ret.) of JAMS and executed a Settlement Term Sheet to settle this Action;

5           **WHEREAS**, pursuant to the Notice of Settlement and Joint Stipulation and Request to  
6 Vacate Dates and Order Setting Date to File Motion for Preliminary Approval of Settlement (the  
7 “Stipulation”), Plaintiffs indicated that they intended to file their motion for preliminary approval  
8 of the settlement within 45 days of the Court’s approval of the Stipulation, or August 19, 2019;

9           **WHEREAS**, Plaintiffs have received competitive bids from prospective settlement  
10 administrators and, with Defendant, require additional time to review and select an appropriate  
11 settlement administrator, as well as additional time to work with that administrator to ensure that  
12 a proposed claims process will encourage maximum class member participation;

13           **WHEREAS**, the Parties have made substantial progress toward completing a Stipulation  
14 of Settlement and related documents, but require additional time to complete those efforts;

15           **WHEREAS**, the Parties have conferred and agree that Plaintiffs’ deadline to file their  
16 motion for preliminary approval of the settlement shall be continued to September 4, 2019;

17           **WHEREAS**, the Court’s next available hearing date is in January 2020 and, should the  
18 Court hold a hearing, the extension sought here will not delay the Court’s consideration of the  
19 motion in that time frame;

20           **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the  
21 Parties, through their respective counsel, to the request for entry of an Order providing that  
22 Plaintiffs’ deadline to file their motion for preliminary approval of the settlement shall be  
23 September 4, 2019.

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1                   **IT IS SO STIPULATED.**

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3       DATED: August 15, 2019

4       Respectfully submitted,

5       **DLA PIPER LLP (US)**

6       By: /s/ Angela C. Agrusa  
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Executed this 15th day of August, 2019, at San Francisco, California.

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Mario M. Choi

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**IT IS SO ORDERED.**

DATED: 8/16/2019

  
HON. HAYWOOD S. GILLIAM, JR.  
United States District Court Judge